

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

D. H. PACE COMPANY, INC.,

Plaintiff,

v.

MATTHEW JOHNSON, CRAIG  
JOHNSON and LIBERTY GARAGE  
DOOR SERVICES, LLC,

Defendants.

Civil Action File  
No. 1:22-cv-01005-SEG

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**JOINT MOTION TO EXTEND DEADLINES**

Plaintiff, D.H. Pace Company, Inc., and Defendants, Matthew Johnson, Craig Johnson, and Liberty Garage Door Services, LLC, respectfully move, pursuant to Fed. R. Civ. P. 6(b)(1)(A), for an Order extending the discovery period by two (2) months in this action through and including August 2, 2023, and extending the deadlines for filing discovery motions and summary judgment motions likewise. Accordingly, the parties show the Court as follows:

1. On February 22, 2023, the Court entered an Order setting the end of Discovery for June 2, 2023, and the deadline to file Summary Judgment Motions for July 14, 2023. (Doc No. 117).

2. Since the Court set this deadline, the parties have worked

cooperatively and diligently through the discovery process.

3. The parties have conducted significant discovery during this time; however, Defendants' counsel has been in a three (3) week trial that has interrupted discovery in this matter. To complete all necessary discovery and conduct additional depositions, the parties need more time.

4. As a result, the parties jointly request to extend the discovery deadline by two (2) months through and including August 2, 2023.

5. The parties also request a similar extension for filing discovery motions and summary judgment motions through and including September 14, 2023.

6. For these reasons, the parties respectfully request that the Court extend the deadline for discovery to August 2, 2023, and the deadline to file discovery motions and summary judgment motions to September 14, 2023. A proposed Order to this effect is attached as Exhibit 1.

Respectfully submitted this 19<sup>th</sup> day of May 2023.

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